

EXHIBIT A

|  |  |                        |                |
|--|--|------------------------|----------------|
| CO-30 A  | NEW JERSEY STATE PRISON<br>POSTAGE REMIT                       |                        | Rev. 3/1/21    |
| DATE:  | 12/11/23   |                        | LOCATION: 6R81 |
| SBI NUMBER:  | 102517G  |                        |                |
| INMATE NAME:   | CALIB MC GILLIVRAY   |                        |                |
| INMATE SIGNATURE:  | <i>KAP</i>   |                        |                |
| TO: BUSINESS MANAGER   | DATE MAILED:   |                        |                |
| (✓) Check Appropriate Box (s)  |  |                        |                |
| <input checked="" type="checkbox"/>  | Legal Postage  | \$                     |                |
| <input checked="" type="checkbox"/>  | Certified Cert. #70120470000211410932                          | 4.35                   |                |
| <input checked="" type="checkbox"/>  | Return Receipt Requested                                       | 3.55                   |                |
| <input checked="" type="checkbox"/>  | Postage Affixed; SEND DIRECT<br>Legal Postage Only TO MAILROOM | 0                      |                |
| <input type="checkbox"/>   | Regular Postage or UPS Property                                |                        |                |
| <input type="checkbox"/>   | Additional Insurance Amount \$                                 |                        |                |
| <input type="checkbox"/>   | No Postage Inter Office Mail                                   |                        |                |
| Weight of Mail/Property  |  | Total Postage and Fees | \$ 7.90        |
| SENT TO: MARGARET RAYMOND FLOOD  |  |                        |                |
| ADDRESS: PRINT 400 CROSSING BLVD., 8 <sup>TH</sup> FLOOR<br>BRIDGEWATER, NJ 08807-5933 |  |                        |                |
| WITNESS: B.V. - 1  |  | APPROVED BY: 12/11     |                |
| SIGNATURE: <i>82</i>   |  |                        |                |
| CHECK#   |  | DATE:                  |                |

Caleb L. McGillvary, Pro Se  
#1222665/SBI#102317G  
New Jersey State Prison  
Po Box 861  
Trenton, New Jersey  
08625-0861

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

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CALEB L. MCGILLVARY ) CIVIL ACTION NO.  
PLAINTIFF ) 3:22-cv-06430-MAS-LHG  
              ) Hon. Michael A. Shipp, U.S.D.J.  
V.              ) Hon. Lois H. Goodman, U.S.M.J.  
              )  
RAHMO REIZ     )  
DEFENDANT     )

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PLAINTIFF'S FIRST SET OF INTERROGATORIES

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PROPOUNDING PARTY: Caleb L. McGillvary

RESPONDING PARTY: Rahmo Reiz

SET NO. 1

INSTRUCTIONS FOR RESPONDING

A. These interrogatories are to be answered by you based on all the information that is or may be available to you, or any person, employee, agent, expert, accountant or attorney who has acted or is now acting on your behalf.

B. If, after a reasonable and thorough investigation, using due diligence, you are unable to answer any interrogatory, or any part of an interrogatory, on the grounds of lack of information available to you, specify in full and complete detail why the information is not available to you and what has been done to locate such information. In addition, specify what knowledge or belief you do have concerning the unanswered portion of any interrogatory and set forth the facts on which such knowledge or belief is based.

C. When an interrogatory does not specifically request a particular fact, but when that fact or facts are necessary to make the answer to the interrogatory either comprehensible, complete, or not misleading, you should include that fact or those facts as part of the answer. The interrogatory shall be deemed specifically to request whatever fact or facts are needed to make the response comprehensible without reference to any other matter.

D. If you claim any form or privilege with regard to any oral communication, document, or tangible thing, whether based on a statute or otherwise, as a ground for not answering an interrogatory or any portion of an interrogatory, or for not voluntarily producing any tangible thing or document, set forth in your answers, with respect to each oral communication, document, or tangible thing for which you claim such a privilege, the following:

1. The date of any oral communication or the date of preparation of any document;

2. The name, address, title, and occupation of each of the participants in any oral conversation or each of the authors and addresses of any document;

3. The name, title, and address of the present custodian of any document or tangible thing;

4. A description of each oral conversation, document, or tangible thing (by subject matter or title) that is sufficient to identify the particular conversation or tangible thing without revealing its content, but with sufficient detail to set out the legal and factual basis for the application of the privilege claimed for that conversation, document, or tangible thing.

E. When statements of factual information are requested, the requested information includes the identification of all formal and informal documentation that explains, clarifies, describes, or in any way relates to the requested statement of factual information.

F. For the purposes of these interrogatories, whenever necessary to ensure completeness or accuracy, words importing the singular number include the plural and words importing the plural number include the singular, and words importing the masculine include the feminine.

G. With respect to any interrogatory or answer in which reference is made to an oral communication, specify the following:

1. The name, company or other affiliation, and title or identifying feature of the individual who made the oral communication;

2. The name, company or affiliation, and title or other identifying feature of each individual to whom the oral communication was made;

3. The date on which the oral communication was made;

4. The place where the oral communication was made;

5. The names of each and every individual who heard the oral communication if different or in addition to those individuals

to whom the oral communication was made. If the names of these individuals are not sufficient to permit the identification of the individuals, include a description of these individuals that will be sufficient to permit their identification by Caleb L. McGillvary;

6. The nature and content of the oral communication, repeating the actual words used to the extent possible and, when not possible, paraphrasing in detail those words;

7. State whether any individual to whom the oral communication was made, or who heard the oral communication, made any statements in response to the communication and, if so, identify the response or responses in detail, repeating the actual words used to the extent possible, and, when not possible, paraphrasing those words; and

8. State whether the oral communication was ever memorialized in any document. If so, identify each the document in sufficient detail to permit the preparation of a valid request to produce it under Rule 34.

H. These interrogatories are continuing in nature and responses that Rahmo Reiz later learns are inaccurate or incomplete are to be reasonably supplemented as required by Rule 26(e).

#### DEFINITIONS

When used in these interrogatories:

A. The words you or your mean the defendant and also his employer corporation, and, when appropriate, include its present and former officers, agents, employees and all other persons acting or purporting to act on behalf of it for the period during which defendant was employed by it.

B. The words identify, identity, or identification when used in reference to a natural person mean to state his or her full name and present or last known address, his or her present or last known position and business affiliation, and each of his or her positions during the applicable time period; when used in reference to an artificial person (e.g., corporation, partnership, etc.), they refer to its full name and present or last known business address; when used in reference to a document kept or prepared in the course of business, they mean to state its date, its author, the type of document (e.g., letter, memorandum, chart, form bill of lading, etc.), or, if this information is not available, some other means of identifying the document, and in all cases the present location of the document together with the name of its custodian.

C. The words document or documents mean the original or copies of any written, recorded or graphic matter, however produced or reproduced, including, but not limited to, all letters,

telegrams, correspondence, reports, memoranda, agreements, contracts, recordings or memorials of telephone conversations or of meetings or of conferences, inter-office communications, work papers, cost sheets, estimating sheets, bids, invoices, bills, purchase orders, time cards, work records, electronically stored information or other writings. The term document is defined to be synonymous in meaning and equal in scope to the usage of this term in Fed. R. Civ. P. 34(a). A draft or non-identical copy is a separate document within the meaning of this term.

D. Unless otherwise specified, each Interrogatory requests information for the period from May 31, 2019 until the present.

INTERROGATORY NO. 1. State the name and address of each person who may have information relative to the claims at issue in this action, specifying what information such person has and where, when, and how they obtained it.

ANSWER:

INTERROGATORY NO. 2. State which of the persons whose names are contained in the answer to interrogatory No. 1 above:

a. Made written statements to you or your agents concerning this matter, and

b. The name, title, and address of the custodian of each written statement.

INTERROGATORY NO. 3. State the name and, if known, the address and telephone number of each individual likely to have discoverable information - along with the subjects of that information - that the disclosing party may use to support its claims or defenses;

INTERROGATORY NO. 4. State which of the persons whose names are contained in the answer to interrogatory No. 1 above:

a. Made written statements to you or your agents concerning this matter, and

b. The name, title, and address of the custodian of each written statement.

INTERROGATORY NO. 5. Do you, your attorneys, or any person employed by you or your attorneys, have possession of, or know of the existence of, any: Books or other printed material; Records or reports made in the course of business; Photographs, moving or still or x-ray; Drawings, charts, maps, or diagrams; Other documentary material; Models, specimens, or samples; Other tangible objects that contain information bearing on the issue of Plaintiff's dental diagnosis and treatment; Electronically

Stored information bearing on the issue of Plaintiff's dental diagnosis and treatment; or Other tangible objects that are relevant to Plaintiff's dental diagnosis and treatment, or that you intend to rely on to support the allegations of your answer?

ANSWER:

INTERROGATORY NO. 6. If so, for each item, state its description, which shall include

- a. Its form, name, number, or other means of general identification
- b. Its size
- c. The date on which it was made, prepared, or taken
- d. The name, or other means of identification, address, job title or capacity, and relationship to you of each person who made, prepared or took it
- e. The address or location of the place where it was made, prepared or taken
- f. The method by which it was made, prepared or taken
- g. The purpose for which it was made, prepared or taken
- h. The name, or other means of identification, address, job title or capacity, and relationship to you of each person who authorized, ordered or approved its making, preparation or taking
- i. The number of copies or duplicates that were made
- j. The cost of preparation or taking
- k. The cost of reproducing a copy or duplicate, and the time such reproduction or duplication would take
- l. Its present location, indicating address and location within the address
- m. The name, address and job title of each person who has custody of the original
- n. The name, address and job title of each person who has possession of a copy of it
- o. In what way it is relevant to the subject matter of this action
- p. The method and procedure of its storage and retrieval in records archives or information systems, with the make, model and serial number of each device so used in such methods and procedures

INTERROGATORY NO. 5. Have any of the items mentioned above been altered in any manner since this action arose or after the item was initially made, taken, or prepared?

ANSWER:

INTERROGATORY NO. 6. If so, for each item, state its description, which shall include:

- a. Each date on which it was altered
- b. A description of each alteration
- c. The reason for each alteration
- d. The name, address, and job title of each person who made the alteration

ANSWER:

INTERROGATORY NO. 7. Have any of the items referred to above been lost, destroyed, consumed, or otherwise ceased to exist?

ANSWER:

INTERROGATORY NO. 8. If so, for each item, state a description of the item, which shall include:

- a. The date it was lost or ceased to exist
- b. The circumstances of its loss or the reason it ceased to exist
- c. The name, address, and job title of each person who has knowledge concerning the manner in which it was lost or ceased to exist
- d. The name, address, and job title of each person who has knowledge concerning its nature or contents
- e. Whether there has been any attempt to reproduce, duplicate, or find it, and, if so, a description of each attempt and its results

ANSWER:

Dated: 12/11/23

By:   
Caleb L. McGillvary, Pro Se  
#1222665/SBI#102317G NJSP  
PO Box 861 Trenton, NJ  
08625-0861

CERTIFICATE OF SERVICE

I declare pursuant to 28 U.S.C. 1746 that a true and correct copy of the attached Interrogatories, together with all attachments and exhibits, was sent by first-class U.S. mail in a properly addressed envelope with first class postage duly paid on DECEMBER 11, 2023 to the attorneys of record for all of the parties in this action at the addresses listed below:

1. Margaret Raymond Flood  
Attorney for Rahmo Reiz  
400 Crossing Blvd., 8th Floor  
Bridgewater, NJ 08807-5933

I declare under penalty of perjury that the foregoing statements are true and accurate

Dated: 12/11/23



Caleb L. McGillvary, Pro Se